

Republic of Tajikistan

**Rogun Project Management Group (PMG) for
the Power Plant Construction under the
President of the Republic of Tajikistan and State
Enterprise Directorate of the Flooding Zone
(DFZ) of the Rogun HPP**

**Sustainable Financing for Rogun Hydropower
Project (P181029)**

[Draft]

**ENVIRONMENTAL AND SOCIAL
COMMITMENT PLAN (ESCP)**

[June __, 2024]

ENVIRONMENTAL AND SOCIAL COMMITMENT PLAN

1. The Republic of Tajikistan (Recipient) will implement the Sustainable Financing for Rogun Hydropower Project (the Project), with the involvement of the Rogun Project Management Group (PMG) for the Energy Facilities Construction under the President of the Republic of Tajikistan and the State Enterprise Directorate of the Flooding Zone (DFZ) of the Rogun HPP and with the assistance of the Rogun Open Joint Stock Company (OJSC), as set out in the Financing Agreement. The International Development Association (the Association) has agreed to provide financing for the Project, as set out in the referred agreement.
2. The Recipient shall ensure that the Project is carried out in accordance with the Environmental and Social Standards (ESSs) and this Environmental and Social Commitment Plan (ESCP), in a manner acceptable to the Association. The ESCP is a part of the Grant Agreement. Unless otherwise defined in this ESCP, capitalized terms used in this ESCP have the meanings ascribed to them in the referred agreement.
3. Without limitation to the foregoing, this ESCP sets out material measures and actions that the Recipient shall carry out or cause to be carried out, including, as applicable, the timeframes of the actions and measures, institutional, staffing, training, monitoring and reporting arrangements, and grievance management. The ESCP also sets out the environmental and social (E&S) instruments that shall be adopted and implemented under the Project, all of which shall be subject to prior consultation and disclosure, consistent with the ESSs, and in form and substance and in a manner acceptable to the Association. Once adopted, said E&S instruments may be revised from time to time with prior written agreement by the Association.
4. Where the ESCP identifies a party other than the Recipient as the Responsible Entity for a material measure or action, the Recipient retains ultimate responsibility for the Responsible Entity's implementation of the material measure or action and therefore will supervise and report on the Responsible Entity's implementation.
5. As agreed by the Association and the Recipient, this ESCP will be revised from time to time if necessary, during Project implementation, to reflect adaptive management of Project changes and unforeseen circumstances or in response to Project performance. In such circumstances, the Recipient, through the PMG, and the Association agree to update the ESCP to reflect these changes through an exchange of letters signed between the Association and the Director of PMG. The Recipient shall promptly disclose the updated ESCP.

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
MONITORING AND REPORTING			
A	<p>REGULAR REPORTING</p> <p>Prepare and submit to the Association regular monitoring reports on the environmental, social, health and safety (ESHS) performance of the Project, including but not limited to the implementation of the ESCP, status of preparation and implementation of E&S instruments required under the ESCP, stakeholder engagement activities, and functioning of the grievance mechanism(s). Reports shall include copies of reports submitted by OJSC and DFZ, which in turn shall include copies and summaries of Project Management Consultant (PMC) and Contractor reports as well as summaries of actions taken by PMG and other parties to supervise ESHS performance of OJSC and DFZ.</p> <p>Require the PMC to prepare and submit to OJSC monthly monitoring reports that summarize Contractors' ESHS performance and its own ESHS supervision activities (including actions taken in response to the report, if any).</p> <p>Require OJSC and DFZ to provide monthly reports to PMG that summarizes their Contractors' ESHS performance and their own ESHS supervision of Contractor performance.</p>	<ol style="list-style-type: none"> 1. Submit six-monthly reports to the Association throughout Project implementation, commencing after the Effective Date of the Project. Submit each report to the Association no later than 30 days after the end of each reporting period. 2. Throughout Project implementation 3. Throughout Project Implementation 	<ol style="list-style-type: none"> 1. PMG 2. PMG 3. PMG
B	<p>INCIDENTS AND ACCIDENTS</p> <p>Promptly notify the Association of any incident or accident related to the Project which has, or is likely to have, a significant adverse effect on the environment, the affected communities, the public or workers, including, inter alia, cases of gender-based violence (GBV), sexual exploitation and abuse (SEA), sexual harassment (SH), and accidents that result in death, serious or multiple injury. Provide sufficient detail regarding the scope, severity, and possible causes of the incident or accident, indicating immediate measures taken or that are planned to be taken to address it, and any information provided by any contractor and/or supervising firm, as appropriate.</p> <p>Subsequently, at the Association's request, prepare a report on the immediate and underlying causes of the incident or accident and propose measures to address those causes and prevent a recurrence of the incident or accident.</p>	<ol style="list-style-type: none"> 1. Notify the Association no later than 48 hours after learning of the incident or accident. 2. Provide subsequent report to the Association within a timeframe acceptable to the Association. 	<ol style="list-style-type: none"> 1. PMG 2. PMG

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Require DFZ and OJSC to report to PMG any such incident in the paragraph above so that PMG can make a timely report to the Association.	DFZ and OJSC to notify PMG no later than 48 hours after learning of the incident or accident.	
C	<p>CONTRACTORS' MONTHLY REPORTS</p> <p>Require contractors and supervising firms hired by PMG, OJSC, and DFZ to provide monthly monitoring reports on ESHS performance in accordance with the metrics specified in the respective bidding documents and contracts and submit such reports to the Association.</p>	Monthly, starting within the first ten days after the Effective Date and thereafter throughout the life of the respective contracts.	PMG
ESS 1: ASSESSMENT AND MANAGEMENT OF ENVIRONMENTAL AND SOCIAL RISKS AND IMPACTS			
1.1	<p>ORGANIZATIONAL STRUCTURE</p> <ol style="list-style-type: none"> 1. Appoint and maintain a team acceptable to the Association that is tasked with ESHS management, with qualified staff and resources to support management of ESHS risks and impacts of the Project as required by the ESMP. 2. Maintain the independent Environmental and Social Panel of Experts (ESPoE) to provide independent advice to the PMG and OJSC on the planning, management, construction, and supervision of the Project, including the resettlement program, to ensure they are adequate, robust, and in line with global standards for the protection of workers, people, and the environment, including hydrological considerations. Support visits to Tajikistan by the ESPOE at least twice per year through the end of reservoir filling and full commissioning of the HPP. 3. Require OJSC and DFZ to appoint and maintain, and require their Contractors to appoint and maintain, at least the respective numbers of qualified ESHS staff required by the ESMP. The required numbers may be adjusted based on mutual agreement between PMG and the Association. 	<ol style="list-style-type: none"> 1. Appoint by no later than one month after the Effective Date and maintain throughout Project Implementation. 2. Throughout Project implementation and, thereafter, until two (2) years after the filling of the reservoir to the fully supply level and commissioning of the Rogun HPP 3. Appoint by no later than one month after the Effective Date and maintain throughout Project Implementation 	<ol style="list-style-type: none"> 1. PMG 2. PMG 3. PMG

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
1.2	<p>ENVIRONMENTAL AND SOCIAL INSTRUMENTS</p> <ol style="list-style-type: none"> Finalize, disclose, adopt, and implement the Environmental and Social Impact Assessment (ESIA), and the corresponding Environmental and Social Management Plan (ESMP) for the Project, consistent with the relevant ESSs and in a manner acceptable to the Association. Develop and disclose in a manner acceptable to the Association the final Cumulative Impact Assessment (CIA) as part of the ESIA, taking into consideration the comments received from stakeholders. Modify existing contracts for Lots 2, 3 and 4 early works to include relevant requirements of the ESIA and ESMP. 	<ol style="list-style-type: none"> Finalize, disclose and adopt the ESIA and ESMP no later than the Effective Date, and thereafter implement the ESIA and the corresponding ESMP throughout Project implementation. No later than the Effective Date. No later than the Effective Date. 	<ol style="list-style-type: none"> PMG PMG PMG
1.3	<p>MANAGEMENT OF CONTRACTORS</p> <p>Incorporate the relevant aspects of the ESCP, including, inter alia, the relevant E&S instruments, the Labor Management Procedures, and code of conduct, into the ESHS specifications of the procurement documents and contracts with contractors and supervising firms. Thereafter ensure that the contractors and supervising firms comply and cause subcontractors to comply with the ESHS specifications of their respective contracts.</p>	<p>For new contracts: As part of the preparation of procurement documents and respective contracts.</p> <p>For existing contracts: No later than the Effective Date.</p> <p>Supervise contractors throughout Project implementation.</p>	PMG [and DFZ]
1.4	<p>TECHNICAL ASSISTANCE</p> <p>Ensure that the consultancies, studies (including feasibility studies, if applicable), capacity building, training, and any other technical assistance activities under the Project, including, inter alia, the environmental and social instruments to be supported under the Project are carried out in accordance with terms of reference acceptable to the</p>	Throughout Project implementation.	PMG and DFZ

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	Association, that are consistent with the ESSs. Thereafter ensure that the outputs of such activities comply with the terms of reference.		
1.5	<p>ASSOCIATED FACILITIES</p> <p>Ensure that Associated Facilities (as defined in ESS1), which include the International Highway (Vakhdat-Jirgital), the International Highway Bridge over the reservoir, CASA-1000 123 km 500 kV line from Rogun HPP to Sangtuda, four 100 km 500 kV overhead lines transporting power from the Project to Dushanbe substation, and any other Associated Facilities that may be identified during Project implementation which are under the control or influence of the Recipient are carried out in accordance with the applicable requirements of this ESCP and the ESSs, including, inter alia, the requirements of the ESIA, ESMP, LMP, management of contractors, RAP, and SEP.</p>	Throughout Project implementation.	PMG
ESS 2: LABOR AND WORKING CONDITIONS			
2.1	<p>LABOR MANAGEMENT PROCEDURES</p> <ol style="list-style-type: none"> Adopt and implement the Labor Management Procedures (LMP) for the Project, including, inter alia, provisions on working conditions, management of worker relationships, occupational health and safety (including personal protective equipment, and emergency preparedness and response), code of conduct (including relating to SEA and SH), forced labor, child labor, grievance arrangements, worker accommodations for Project workers, and applicable requirements for OJSC and DFZ contractors, subcontractors, and supervising firms. Require OJSC and DFZ to adopt guidelines/template to establish site-wide rules for Occupational Health and Safety in accordance with the requirements of the ESMP. Review and approve Contractors' Occupational Health and Safety management plans that are consistent with the site-wide guidelines, ESS4, the ESMP and good international industry practice (GIIP). 	<ol style="list-style-type: none"> Adopt the LMP by Appraisal, and thereafter implement the LMP throughout Project implementation. Prior to Effective Date One month after Effective Date 	<ol style="list-style-type: none"> PMG PMG PMG

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	<ol style="list-style-type: none"> 4. Require OJSC and DFZ to adopt guidelines/template to establish site-wide rules for Emergency Response Procedures in accordance with the requirements of the ESMP. 5. Review and approve Contractors’ Emergency Response Management Plans that are consistent with the site-wide guidelines, ESS4, the ESMP and GIIP. 	<ol style="list-style-type: none"> 4. Prior to Effective Date 5. One month after Effective Date 	<ol style="list-style-type: none"> 4. PMG 5. PMG
2.2	<p>GRIEVANCE MECHANISM FOR PROJECT WORKERS</p> <p>Establish and operate a grievance mechanism for Project workers, as described in the LMP and consistent with ESS2. The grievance mechanism shall include a channel to enable communities to confidentially and anonymously reports sensitive grievances in accordance with the LMP.</p>	<p>No later than the Effective Date.</p> <p>Maintain, operate, and report on the grievance mechanism throughout Project implementation.</p>	PMG and DFZ.
ESS 3: RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT			
3.1	<p>LEGACY WASTE AND CONTAMINATED LANDS MANAGEMENT PLANS</p> <ol style="list-style-type: none"> 1. Appoint a Consultant based on terms of reference acceptable to the Association to conduct an investigation of all areas used for construction, past and present, to identify legacy wastes and contaminated lands, including asbestos and polychlorinated biphenyl compounds, and propose remedial measures in a written report. 2. Cause Contractors to implement remedial measures, and inspect areas under each Contractor’s control to verify satisfactory implementation of guidelines and instructions. 3. For lands under OJSC’s control, require OJSC to implement remedial measures. 	<ol style="list-style-type: none"> 1. Appoint consultant one month after the Signature Date; complete report no later than the Effective Date. 2. Prior to authorizing demobilization and making final payment, which shall be completed prior to inundation of the areas. 3. One month prior to inundation of the areas. 	<ol style="list-style-type: none"> 1. PMG 2. PMG 3. PMG

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
3.2	<p>WASTE MANAGEMENT PLANS</p> <ol style="list-style-type: none"> 1. Require OJSC and DFZ to develop guidelines/template to establish site-wide rules for waste management for ongoing construction and operation in accordance with the requirements of the ESMP. 2. Modify existing contracts to require development and implementation of Waste Management Plans that comply with the site-wide guidelines for all solid and liquid wastes they may generate, store, dispose, reuse, or otherwise manage during construction and operations. 3. Review and approve contractor waste management plans (WMPs) to manage non-hazardous and hazardous waste. 4. Require Contractors to adopt and implement their approved WMPs. 5. Supervise implementation of Contractors' WMPs. 	<ol style="list-style-type: none"> 1. Prior to the Effective Date 2. [No later than the Effective Date]. 3. Within six months after the Effective Date for existing contracts and throughout Project implementation for new contracts. 4. Adopt WMPs: (a) for new contracts, prior to mobilization of work force and equipment and (b) for existing contracts, immediately upon approval of their WMPs. Thereafter, implement throughout Project implementation. 5. Throughout Project implementation. 	PMG

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
3.3	<p>RESOURCE EFFICIENCY AND POLLUTION PREVENTION AND MANAGEMENT</p> <ol style="list-style-type: none"> Require Contractors’ environmental and social management plans, as required by the ESMP, to include relevant resource efficiency and pollution prevention measures. Supervise the implementation of the referenced plans in 3.2.3. 	<ol style="list-style-type: none"> Prepare and adopt: (a) for existing contracts, no later than the Effective Date and (b) for new contracts, as part of the preparation of procurement documents and respective contracts. Supervise Contractors throughout Project implementation. Throughout Project implementation. 	<ol style="list-style-type: none"> PMG PMG
ESS 4: COMMUNITY HEALTH AND SAFETY			
4.1	<p>TRAFFIC AND ROAD SAFETY</p> <ol style="list-style-type: none"> Update the current site-wide traffic management plan in accordance with the requirements of ESS4, the ESMP and GIIP, which shall include sitewide requirements to be implemented immediately and requirements for individual contractors to adapt plans for their areas of control. Review and approve Contractors’ road and traffic safety management plans for consistency with the site-wide plan, ESS4, the ESMP and GIIP. Require OJSC Rogun and Contractors to adopt and implement the updated traffic management plans. Supervise the implementation of the Contractors’ traffic management plans. 	<ol style="list-style-type: none"> Prior to the Effective Date. One month after Effective Date As required by site-wide plan, but no later than 3 months after the Effective Date and throughout Project implementation. Throughout Project implementation. 	<ol style="list-style-type: none"> PMG PMG PMG PMG

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
4.2	<p>SEA AND SH RISKS</p> <p>Maintain and implement the Gender Action Plan, with measures to assess and manage the risks of GBV, SEA and SH and supervise DFZ and OJSC implementation of relevant requirements.</p>	Throughout Project implementation.	PMG
4.3	<p>SECURITY MANAGEMENT</p> <ol style="list-style-type: none"> 1. Assess and implement measures to manage the security risks of the Project, including the risk of engaging security personnel to safeguard project workers, sites, assets and activities, as set out in the Security Management Plan, guided by the principles of proportionality and GIIP, and by applicable law, in relation to hiring, rules of conduct, training, equipping and monitoring of such personnel. 2. The hiring and use of any security personnel by the Rogun HPP or any other contractor for the construction activities of the dam and all associated facilities shall be compliant with the requirements of ESS4 and recorded in the Security Management Plan. 3. Ensure the contractors develop and implement measures and actions to assess and manage risks to community and to workers from the use of security personnel, consistent with ESS4 and as set out in the Security Management Plan, including, without limitation, the application of the principles of proportionality, the law, verification of contracted workers records to ensure they are not implicated in past abuses, investigate incidents, report unlawful acts to authorities. 4. Implementation of the relevant measures related to risk management of security personnel. 	<ol style="list-style-type: none"> 1. Adopt the Security Management Plan no later than the Effective Date, and thereafter implement throughout Project implementation. 2. Throughout Project implementation. 3. Throughout Project implementation. 4. Throughout Project implementation. 	<ol style="list-style-type: none"> 1. PMG and DFZ 2. PMG and DFZ 3. PMG and DFZ 4. PMG and DFZ
4.4	<p>INVOLVEMENT OF THE MILITARY</p> <ol style="list-style-type: none"> 1. Prepare, adopt and implement the Security Management Plan in a manner acceptable to the Association. 	<ol style="list-style-type: none"> 1. Prepare no later than the Effective Date; thereafter implement throughout Project implementation. 	<ol style="list-style-type: none"> 1. PMG

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>2. Ensure the following measures are in place and continue to be carried out as long as the Tajikistan army is deployed for the provision of security to Project workers, sites and/or assets, consistent with the ESSs:</p> <p>a. Assess and implement measures to manage the security risks of engaging the Tajikistan army as set out in the Security Management Plan, guided by the principles of proportionality and GIIP, and by applicable law, in relation to screening, hiring, rules of conduct, training, equipping, and monitoring of such Tajikistan army;</p> <p>b. Adopt and implement standards, protocols, and codes of conduct for the selection and assignment of the Tajikistan army to the Project, and screen to verify that they have not engaged in past unlawful or abusive behavior, including sexual exploitation and abuse (SEA), sexual harassment (SH) or excessive use of force;</p> <p>c. Enter into a memorandum of understanding (MoU), with the Ministry of Defense and Tajikistan army, setting out the arrangements for the engagement of the Tajikistan army in the Project, including the relevant actions and measures set out in this ESCP;</p> <p>d. Provide adequate instruction and training to the Tajikistan army on a regular basis, on the use of force and appropriate conduct (including in relation to civilian-military engagement, SEA and SH, and other relevant areas), as set out in the Security Management Plan and MoU;</p> <p>e. Continue to ensure that the stakeholder engagement activities under the Stakeholder Engagement Plan (SEP) include communication on the involvement of the Tajikistan army in the Project;</p> <p>f. Ensure that any concerns or grievances regarding the conduct of the Tajikistan army are received, monitored, and documented (taking into account the need to protect confidentiality) by the Project’s grievance mechanism (see action 10.2 below), which shall facilitate its resolution, in accordance with ESS4 and ESS10. Notify the Association after receiving the concern or grievance, as set out under action B above; and</p>	<p>a. By [x months after] the Effective Date, and thereafter throughout Project implementation.</p> <p>b. By [x months after] the Effective Date and thereafter throughout Project implementation.</p> <p>c. By [x months after] the Effective Date and thereafter implement throughout Project implementation.</p> <p>d. Throughout Project implementation.</p> <p>e. Throughout Project implementation.</p> <p>f. Throughout Project implementation.</p>	<p>2. PMG</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>g. Where the Association so requests in writing, after consultation with the Recipient: (i) promptly appoint a third- party monitor consultant, with terms of reference, qualifications and experience acceptable to the Association, to visit and monitor the Project area where the Tajikistan army is deployed, collect relevant data and communicate with Project stakeholders and beneficiaries; (ii) require the third-party monitor consultant to prepare and submit monitoring reports, which shall be promptly made available to and discussed with the Association; and (iii) promptly take any actions, as may be requested by the Association upon its review of the third-party monitor consultant reports.</p>	<p>g. As promptly as possible, as required by the Association.</p>	
<p>4.5 DAM SAFETY (FOR ANNEX A, PARA. 2. ESS4)</p> <ol style="list-style-type: none"> 1. Maintain and convene the independent Dam Safety Panel of Experts (DSPoE) for reviewing and confirming the adequacy of the design, quality of construction works, and other required dam safety measures including dam safety plans. 2. Inform the Association in advance of the DSPoE meetings and share with it a copy of the DSPoE report of its conclusion and recommendations signed by each participating member after each meeting. Implement the recommendations made by the DSPoE, unless otherwise agreed to in writing by the Association. 3. (a) Recruit the new PMC in accordance with terms of reference acceptable to the Association and employing experienced and qualified professionals in line with the requirements of the ESMP and (b) ensure that the PMC (i) carries out supervision of the design and construction of the Rogun dam; (ii) prepares and supervises implementation of the Dam Safety Plans (as defined in 4. below); and (iii) ensures that dam safety measures are adopted and implemented during the design, 	<ol style="list-style-type: none"> 1. Throughout Project implementation and then for two years after reservoir filling to the full supply level and commissioning, and convene as frequently as necessary, depending on the status of the project, but no less than two times a year. 2. Throughout Project implementation, and then for two years after reservoir filling to the full supply level and commissioning. 3. (a) No later than November 30, 2024 or six months after the Effective Date, whichever comes first; and (b) throughout Project implementation 	<ol style="list-style-type: none"> 1. PMG 2. PMG 3. PMG

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
<p>procurement of contractors, construction, operation, and maintenance of the Rogun dam and associated works.</p> <p>4. Prepare and update, as required and in form and substance acceptable to the Association and implement the following plans (“Dam Safety Plans”): (i) the Construction Supervision and Quality Assurance Plan; (ii) the Instrumentation Plan; (iii) the Operation and Maintenance Plan (O&M Plan); and (iv) the Emergency Preparedness Plan.</p>	<p>4.</p> <p>i) Prepare no later than June 30, 2025 and, thereafter, implement throughout Project implementation</p> <p>ii) Prepare no later than December 31, 2025 and, thereafter, implement throughout Project implementation</p> <p>iii) [Prepare preliminary O&M Plan by appraisal]; prepare O&M Plan no later than the earlier of: December 31, 2025 or six (6) months prior to the start of any additional filling of the reservoir above 1070 masl and thereafter implement throughout Project implementation; and</p> <p>iv) Emergency Preparedness Plan: prepare no later than the earlier of: June 30, 2025 or twelve (12) months prior to the start of any additional filling of the reservoir above 1070 masl and thereafter implement throughout Project implementation.</p>	<p>4. PMG</p>
<p>5. Prepare a training plan acceptable to the Association and implement an on-site training program for relevant staff on the implementation of the Dam Safety Plans.</p>	<p>5. Prepare by June 30, 2025, and implement throughout Project implementation.</p>	<p>5. PMG</p>
<p>6. Implement mitigation measures as per recommendation of the DSPOE based on the independent assessment of flood discharge tunnels.</p>	<p>6. [Prior to the Effective Date.]</p>	<p>6. PMG</p>

MATERIAL MEASURES AND ACTIONS	TIMEFRAME	RESPONSIBLE ENTITY
ESS 5: LAND ACQUISITION, RESTRICTIONS ON LAND USE AND INVOLUNTARY RESETTLEMENT		
<p>5.1 RESETTLEMENT POLICY FRAMEWORK</p> <p>Adopt and implement a Resettlement and Livelihood Restoration Framework (RLRF) for the Project, consistent with ESS5.</p>	<p>Adopt and disclose the RLRF prior to Appraisal, and thereafter implement the RLRF throughout Project implementation.</p>	<p>DFZ</p>
<p>5.2 RESETTLEMENT PLANS</p> <ol style="list-style-type: none"> 1. Adopt and implement the Resettlement Action Plan (RAP 2) and Livelihood Restoration Plan (LRP 2) for the second-phase of resettlement in the Project’s area as set out in the RLRF, and consistent with ESS5 which shall include: <ol style="list-style-type: none"> (a) an analysis of compensation measures to date and, where necessary, provision of additional compensation, including in-kind support for PAPs who demonstrate that the compensation resulting from the valuation of their houses and structures was insufficient for them to purchase or build new houses and structures sufficient to restore their living standards; and (b) an analysis of livelihood restoration measures to date and, where necessary, provision of additional livelihood restoration support. 2. Ensure that full compensation has been provided and displaced people have been resettled and moving allowances have been provided in accordance with the RAP 2/LRP 2. 3. Hire an independent third-party organization or Consultant with terms of reference acceptable to the Association and ensure that the independent third-party organization or consultancy undertakes quarterly external RAP monitoring. 	<ol style="list-style-type: none"> 1. No later than the Effective Date and, thereafter, implement throughout Project implementation. 2. Before taking possession of the land and related assets 3. Hiring to be completed no later than the Effective Date and then implementation starting the first quarter after the Effective Date and throughout Project implementation thereafter. 	<ol style="list-style-type: none"> 1. DFZ 2. DFZ 3. DFZ

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
	4. Prepare, adopt, and implement Resettlement Action Plans (RAPs) and Livelihood Restoration Plans (LRPs) for subsequent activities under the Project that will require communities and households to be economically and/or physically displaced, as set out in the RLRf, and consistent with ESS5, ensuring that full compensation has been provided and displaced people have been resettled and moving allowances have been provided before taking possession of the land and related assets.	4. Adopt future RAPs/LRPs 3-5 and any additional RAP/LRP as may be required in accordance with the RLRf and implement them throughout Project implementation.	4. DFZ
ESS 6: BIODIVERSITY CONSERVATION AND SUSTAINABLE MANAGEMENT OF LIVING NATURAL RESOURCES			
6.1	Prepare, adopt, disclose, and implement, to the satisfaction of the Association, a Biodiversity Management Plan (BMP), consistent with ESS6, which shall include a program to achieve No Net Loss of biodiversity that compensates for the inundation of natural habitat (specifically, floodplain habitat and remnant Juniper forests)	Adopt and disclose prior to the Effective Date; thereafter implement throughout Project implementation.	PMG and DFZ
6.2	Upon completion of construction, ensure that each Contractor remove structures, temporary roads, and other facilities from areas that are no longer to be used and revegetate with native species, monitoring until vegetation is self-sustaining.	Upon completion of construction and prior to departure of contractor from the Project area.	PMG and DFZ
ESS 8: CULTURAL HERITAGE			
8.1	CULTURAL HERITAGE RISKS AND IMPACTS Adopt and implement a Cultural Heritage Management Plan (CHMP), in accordance with the guidelines of the ESIA and consistent with ESS8.	Adopt and disclose the CHMP prior to the Effective Date, and thereafter, implement throughout Project implementation.	PMG
8.2	CHANCE FINDS Require contractors to implement the chance finds procedure that is part of the ESIA/ESMP of the Project, including training supervisors and workers in their responsibilities.	Describe the chance find procedures in the ESIA/ESMP. Implement the procedure throughout Project implementation.	PMG and DFZ
ESS 10: STAKEHOLDER ENGAGEMENT AND INFORMATION DISCLOSURE			
10.1	STAKEHOLDER ENGAGEMENT PLAN PREPARATION AND IMPLEMENTATION Adopt and implement a Stakeholder Engagement Plan (SEP) for the Project, consistent with ESS10, which shall include measures to, inter alia, provide stakeholders with timely, relevant, understandable and accessible information, and consult with them in a culturally appropriate manner, which is free of manipulation, interference, coercion, discrimination and intimidation.	Update and disclose SEP prior to Negotiations. Adopt final SEP prior to the Effective Date; thereafter, implement throughout Project implementation.	PMG and DFZ

MATERIAL MEASURES AND ACTIONS		TIMEFRAME	RESPONSIBLE ENTITY
10.2	<p>PROJECT GRIEVANCE MECHANISM</p> <p>Maintain and operate an accessible grievance mechanism, to receive and facilitate resolution of concerns and grievances in relation to the Project, promptly and effectively, in a transparent manner that is culturally appropriate and readily accessible to all Project-affected parties, at no cost and without retribution, including concerns and grievances filed anonymously, in a manner consistent with ESS10.</p> <p>The grievance mechanism shall be equipped to receive, register, and facilitate the resolution of SEA/SH complaints, including through the referral of survivors to relevant gender-based violence service providers, all in a safe, confidential, and survivor-centered manner.</p>	Throughout Project implementation.	PMG and DFZ
CAPACITY SUPPORT			
CS1	<p>PMG, DFZ, OJSC and Contractor E&S Training Plans:</p> <ul style="list-style-type: none"> • Stakeholder mapping and engagement • Specific aspects of environmental and social assessment, including environmental and social management plans • Emergency preparedness and response • Community health and safety • Hazardous and non-hazardous waste management • Resettlement and livelihood restoration • Occupational health and safety • GBV/SEA/SH • Worker and external stakeholder GRMs • Worker Code of Conduct 	Training plans to be completed by the Effective Date and training to be done throughout Project implementation.	PMG, OJSC, and DFZ